

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Case No. 5:20-CV-00015-D**

U.S. BANK NATIONAL ASSOCIATION, as)
Trustee for Citigroup Mortgage Loan Trust,)
Inc., Mortgage Pass-Through Certificates,)
Series 2005-3,)

Plaintiff,)

v.)

IBRAHIM N. OUDEH, TERESA SLOAN-)
OUDEH, PIEDMONT NATURAL GAS)
COMPANY, INC., UNITED STATES OF)
AMERICA, STATE OF NORTH)
CAROLINA, and SUBSTITUTE TRUSTEE)
SERVICES, INC., Substitute Trustee,)

Defendants.)
_____)

**MOTION FOR ENTRY OF
DEFAULT AGAINST
DEFENDANTS PIEDMONT
NATURAL GAS COMPANY, INC.
AND SUBSTITUTE TRUSTEE
SERVICES, INC.**

NOW COMES, the Plaintiff, by and through counsel, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure and respectfully moves the Court to enter default against Defendants, Piedmont Natural Gas Company, Inc. and Substitute Trustee Services, Inc. Plaintiff respectfully shows the Court as follows:

1. That copies of the Civil Summons, Lis Pendens, and Verified Complaint were deposited in the post office for mailing by certified mail, return receipt requested, to Defendant, Piedmont Natural Gas Company, Inc., and Defendant, Piedmont Natural Gas Company, Inc., has been served in this action pursuant to Rule 4 of the Federal Rules of Civil Procedure.

2. That Defendant, Piedmont Natural Gas Company, Inc., received the Civil Summons, Lis Pendens, and Verified Complaint on December 16, 2019 as evidenced by the Affidavit of Service filed with the Court and attached hereto as **Exhibit A**.

3. That copies of the Civil Summons, Lis Pendens, and Verified Complaint were deposited in the post office for mailing by certified mail, return receipt requested to Defendant, Substitute Trustee Services, Inc., and Defendant, Substitute Trustee Services, Inc., has been served in this action pursuant to Rule 4 of the North Carolina Rules of Civil Procedure.

4. That Defendant, Substitute Trustee Services, Inc., received the Civil Summons, Lis Pendens, and Verified Complaint on December 12, 2019 as evidenced by the Affidavit of Service filed with the Court and attached hereto as **Exhibit A**.

5. That Defendant, Piedmont Natural Gas Company, Inc., did not file an Answer to the Verified Complaint and has failed to plead or file any type of response or communication within the time allowed by the Federal Rules of Civil Procedure.

6. That Defendant, Substitute Trustee Services, Inc., did not file an Answer to the Verified Complaint and has failed to plead or file any type of response or communication within the time allowed by the Federal Rules of Civil Procedure.

WHEREFORE, Plaintiff prays the Court issue an entry of default against Defendants, Piedmont Natural Gas Company, Inc. and Substitute Trustee Services, Inc., pursuant to Rule 55(a) of the Federal Rules of Civil Procedure in the above captioned case.

Respectfully submitted this the 14th day of December, 2020.

/s/ Claire Collins Dickerhoff
Claire Collins Dickerhoff
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Entry of Default was filed electronically with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Neal Fowler
neal.fowler@usdoj.gov
Attorney for Defendant United States of America

Lareena Jones-Phillips
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Attorney for Defendant State of North Carolina

George J. Oliver
jerry.oliver@smithmoorelaw.com
Stephen W. Petersen
spetersen@foxrothschild.com
Attorneys for Defendant Goshen Medical Center, Inc.

I hereby certify that, a copy of the foregoing Motion for Entry of Default was filed electronically with the Clerk of Court using the CM/ECF system in place for the U.S. District Court, Eastern District of North Carolina, and served upon the following parties by U.S. Mail, First Class, Postage Prepaid:

Piedmont Natural Gas Company
CT Corporation System, Registered Agent
160 Mine Lake Ct., Ste. 200
Raleigh, NC 27615-6417

Substitute Trustee Services, Inc., Substitute
Trustee
L.W. Blake, Registered Agent
201 S. McPherson Church Road, Ste. 232
Fayetteville, NC 28303

Ibrahim N. Oudeh
2202 NC Highway 50 S
Benson, NC 27504

Ibrahim N. Oudeh
721 Tilghman Drive
Suite 400
Dunn, NC 28334

Teresa Sloan-Oudeh
2202 NC Highway 50 S
Benson, NC 27504

This the 14th day of December, 2020.

/s/ Claire Collins Dickerhoff
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